

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

FILED
2002 SEP 16 AM 11:04
DISTRICT OF SOUTH CAROLINA

In Re:

Thomas D Sutton Jr

Debtors.

) Chapter 13

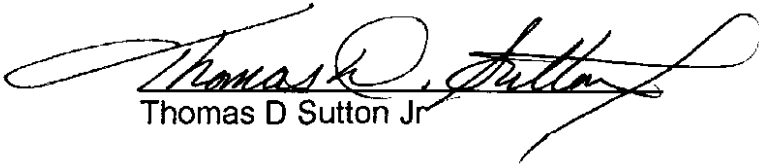
) Bankruptcy No. 02-05231W

MOTION TO SELL REAL PROPERTY

The Debtor moves to be allowed to sell real property upon terms and conditions as set forth below, and in support of said motion allege:

1. The Debtor's Amended Chapter 13 Plan (hereinafter "the Plan") was confirmed by Order of this Court, dated August 30, 2001.
2. Since confirmation of the Plan, the Debtor has made all scheduled payments to the Trustee under the Plan.
3. Debtor owns a home located at 205 Doston Street, Rock Hill, South Carolina (hereinafter referred to as "the Property") which is subject only to the lien of Litton Loan Servicing.
4. The Debtor anticipates to sell the property for the amount owed to Litton Loan Servicing (approximately \$45,000.00) and the Chapter 13 Trustee (approximately \$7,000.00) plus sales commissions for the full satisfaction of the mortgage lien upon the Property.
5. Debtor believes that it would be in his best interest and the best interest of creditors for Debtor to be allowed to sell the Property and use the proceeds to pay the mortgage owed to Litton and The Chapter 13 Trustee in full.

WHEREFORE, Debtor prays that he be allowed to sell the Property upon the terms set forth above and apply the proceeds as set forth above, and for such other and further relief as this Court shall deem just and equitable.


Thomas D Sutton Jr

September 12th, 2002
Rock Hill, South Carolina